



**Wisconsin Department of Transportation**

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**Comments to Docket No. FAA 2003-15389/Airspace Docket No. 03-AGL-09**

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The Wisconsin *Department of Transportation* objects to revoking the Class D airspace along the Lake Michigan shore around the now closed *Merrill C. Meigs Airport (CGX)* at Chicago.

The Meigs air traffic control tower sequenced and deconflicted VFR traffic along the shoreline, even when those aircraft had no intention of landing at CGX. In our opinion, that is a function that should continue, even though CGX no longer exists.

**The VFR corridor along the Lake Michigan shoreline**

The CGX air traffic control tower (ACTC) was important for those Wisconsin pilots headed east or southeast on VFR flights, but who don't like to cross Lake Michigan. They commonly followed the lakeshore from Kenosha, Wisconsin to Gary, Indiana staying VFR below the Chicago/ORD Class B airspace, and as they approached Chicago, would contact the CGX ACTC for traffic advisories and sequencing as the transitioned the CGX Class D airspace. This was particularly valuable because of the number of other VFR aircraft also following the lakeshore while flying under the Class B airspace. The CGX ATCT provided a service that extended far beyond just sequencing aircraft into and out of Meigs. Because of the number of tall skyscrapers in downtown Chicago, and the reluctance of many pilots to fly out very far over Lake Michigan, there is effectively only a very narrow corridor in which pilots can fly VFR when passing Chicago on the east.

**Hold the Class D airspace in reserve status**

We are also reluctant to see the Class D airspace disappear until there is absolutely no chance that Meigs can be reconstituted. Once the Class D airspace is gone, it will be a difficult and time-consuming process to get it back, even if by some stroke of fate the airport is returned to service. We see no reason to rush revoking the Class D airspace, but instead recommend holding it in "reserve status" for a period of three years in the event — unlikely though it is — that Meigs can be reopened.

19-Sep-03

**Recommendation**

We do have one recommendation: Even if Meigs never reopens, we suggest the FAA consider retaining the Class D airspace and staffing something similar to an ATCT that will act as a traffic cop for the many VFR aircraft that fly in the narrow corridor along the Lake Michigan shoreline.

The role of the Meigs ATCT was much larger and more important than just sequencing aircraft into and out of the airport. That is a role the FAA should consider continuing to provide, even with no airport there. Revoking the Class D airspace now, would make it nearly impossible to ever provide such a service.

Sincerely,



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